



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

JAN 25 1996

David B. Kessler (Code AWP-611.2)  
Federal Aviation Administration  
P.O. Box 92007  
Los Angeles, CA 90009

Dear Mr. Kessler:

This letter supplements our comments of November 9, 1995 regarding the Final Environmental Impact Statement and Clean Air Act (CAA) conformity determination for the Burbank-Glendale-Pasadena Airport Land Acquisition and Terminal Replacement Project, Los Angeles County, California.

After further discussions with Ralph Thompson and Daphne Fuller of your headquarters' office, the U.S. Environmental Protection Agency (EPA) now concurs with you that, in making an applicability determination and calculating whether your action is de minimis under 40 C.F.R. § 93.153 of EPA's conformity regulation, you may compare projected total direct and indirect emissions caused by your action with a future emissions baseline which includes growth that would occur even if your action were not constructed (i.e., growth not caused by your action). As we have previously discussed, this determination must be based on the most recent estimates of emissions derived from the most recent population, employment, travel and congestion estimates as determined by the Southern California Association of Governments (SCAG), in accordance with 42 U.S.C. § 176(c)(1) and 40 C.F.R. § 93.159.

When calculating future emissions under § 93.153(b), your analyses should include all emissions caused by the project, including construction emissions, pursuant to § 93.159(d). We note that your applicability calculations use the year 2010 as full build out of the project. You have determined in that year the emissions for all nonattainment pollutants will be the greatest. If 2010 represents the year in which the emissions are the greatest, EPA concurs that your use of this year for applicability purposes would be sufficient to determine that your project is de minimis and meet the requirements of 93.159(d), since the preceding years would also be de minimis.

If you have any further questions regarding these issues, please feel free to contact myself at (415) 744-1207 or Robert Pallarino at (415) 744-1297.

Sincerely,



Wallace Woo  
Chief, Plans Development Section  
Air and Toxics Division

cc:

Thomas Greer, Executive Director, Airport Authority, Burbank  
Ralph Thompson, FAA  
Daphne Fuller, FAA  
Terry Parker, CARB  
Connie Day, SCAQMD  
Arnold Sherwood, SCAG  
Robert Pallarino, EPA